

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re:	Chapter 11
WISCONSIN & MILWAUKEE HOTEL, LLC,	Case No. 24-21743
Debtor.	Honorable G. Michael Halfenger

NOTICE OF ELECTION PURSUANT TO SECTION 1111(b)

Pursuant to section 1111(b) of title 11, United States Code (the “Bankruptcy Code”) and Rule 3014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Computershare Trust Company, N.A. (“Lender”), by its counsel, Reinhart Boerner Van Deuren s.c., hereby provides notice of its election to be treated as a fully secured, non-recourse creditor in accordance with section 1111(b) of the Bankruptcy Code to the full extent its claim is allowed. In support of this notice, Lender states as follows:

1. On April 9, 2024, Wisconsin & Milwaukee Hotel, LLC (the “Debtor”) filed with the Court its voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor continues in possession of its property and manages its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

2. On February 7, 2025, the Debtor filed its Chapter 11 Plan of Reorganization. On April 4, 2025, Debtor filed its Amended Chapter 11 Plan of Reorganization (the “Amended Plan”). Section 3.3 of the Amended Plan gives Lender the option of having its claim in Class 1 (the “Claim”) treated as partly secured, with an unsecured deficiency claim (Option 1A), fully secured by virtue of a section 1111(b) election (Option 1B), or satisfied by payment of \$17.5 million cash (Option 1C). The Claim is secured by substantially all of the Debtor’s assets (the

“Collateral”). The Collateral subject to Lender’s lien is not of inconsequential value and has not been sold by the Debtor pursuant to section 363 of the Bankruptcy Code or otherwise.

3. Lender elects to make a section 1111(b) election so long as the Debtor’s treatment of Lender’s Claim in the Amended Plan remains unchanged and unaltered.

4. Lender reserves the right to withdraw its election if the Amended Plan is materially modified.

5. Lender’s election under section 1111(b) is made without prejudice to its right to object on any grounds to: (i) final approval of the Debtor’s Amended Disclosure Statement for Chapter 11 Plan of Reorganization; and (ii) confirmation of the Amended Plan, and is expressly made without waiver of such rights.

6. Bankruptcy Rule 3014 details the procedure for making a section 1111(b) election. It provides that the election shall be in writing and signed unless made at the hearing on the disclosure statement, and shall be made before the hearing on the disclosure statement concludes. Accordingly, this notice is timely and properly filed.

WHEREFORE, Lender respectfully requests that the Court accept this notice of section 1111(b) election and grant such other and further relief as is just and proper.

DATE: April 7, 2025

COMPUTERSHARE TRUST CO., N.A.

BY: /s/ Frank W. DiCatri

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